

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
AT JACKSON**

**JENNIFER BLACKWELL and  
DAMIEN BLACKWELL,**

**Plaintiffs,**

**V.**

**No. 2:16-cv-2842**

**AUTO-OWNERS (MUTUAL)  
INSURANCE COMPANY,**

**Defendant.**

**NOTICE OF REMOVAL OF A CIVIL ACTION BY DEFENDANT, AUTO-OWNERS**  
**(MUTUAL) INSURANCE COMPANY**

The defendant, Auto-Owners (Mutual) Insurance Company, (hereinafter referred to as “Auto-Owners”), by and through counsel, pursuant to 28 U.S.C. §1446, gives notice of removal of this action from the Circuit Court of Henderson County, Tennessee, to the United States District Court for the Western District of Tennessee, Eastern Division, and alleges as follows:

1. On September 22, 2016, the plaintiffs filed suit in the Circuit Court for Henderson County, Tennessee, naming Auto-Owners (Mutual) Insurance Company as defendant. A copy of the suit filed by the plaintiffs in the Circuit Court for Henderson County, Tennessee, under Civil Action No. 16131-2, is attached as Exhibit 1.

2. On September 29, 2016, Auto-Owners was served with a Summons and Complaint through the Department of Commerce and Insurance as provided by Tenn. Code Ann. § 56-2-504 or Tenn. Code Ann. § 56-2-506.

3. No further proceedings have been had in the Circuit Court of Henderson County, Tennessee.

4. The entire amount of controversy exceeds, exclusive of interest and costs, the sum of Seventy-Five Thousand and No/100 Dollars (\$75,000.00).

5. Diversity of citizenship exists between the plaintiffs and Auto-Owners.

6. This Court has original jurisdiction over the above-styled action, pursuant to the provisions of 28 U.S.C. § 1332(a) and (c), and because the defendant, Auto-Owners, is not a citizen or resident of the State of Tennessee, and because the amount in controversy exceeds Seventy-Five Thousand and No/100 Dollars (\$75,000.00) exclusive of interest and costs. Therefore, this removal is proper, pursuant to 29 U.S.C. § 1441(a).

**WHEREFORE**, Auto-Owners (Mutual) Insurance Company, gives notice of removal of this action from the Circuit Court of Henderson County, Tennessee, to the United States District Court for the Western District of Tennessee.

Respectfully submitted,

s/ E. Jason Ferrell

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of October, 2016, a true and correct copy of the foregoing, NOTICE OF REMOVAL OF A CIVIL ACTION BY DEFENDANT, AUTO-OWNERS (MUTUAL) INSURANCE COMPANY, was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. Mail. Parties may access this file through the court's electronic filing system.

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s/ E. Jason Ferrell  
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EJF:dmt